

Exxon Mobil Corporation

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Ramon L. Echevarria II

Counsel



Via Email and UPS Overnight

January 31, 2014

Lynda Deschambault, Remedial Project Manager
U.S. Environmental Protection Agency
75 Hawthorne Street, SFD-7-1
San Francisco, CA 94105

**Re: Omega Chemical Corporation Superfund Site
General Notice Letter and Request for Information
10628 Fulton Wells Avenue and 10629 Norwalk Blvd, Santa Fe Springs, CA**

Dear Ms. Deschambault:

ExxonMobil Oil Corporation ("ExxonMobil") strongly objects to the General Notice Letter and Request for Information, dated December 18, 2013 (the "Notice Letter"), related to the Omega Chemical Corporation Superfund Site (the "Site"). This is the seventh Information Request by EPA of various ExxonMobil entities which focus on property where ExxonMobil's operations ceased more than 50 years ago.

Notwithstanding, this letter and its attachment constitute the response of ExxonMobil to the Notice Letter and Request for Information. ExxonMobil thanks the EPA for extending the response to all aspects of the Notice Letter until January 31, 2014.

In 2005, ExxonMobil participated in a *de minimis* settlement with EPA for the Site which included releases from the Site. ExxonMobil's position is that the 2005 settlement covers the issues pursued by the current Notice Letter and believes it has no further liability associated with the Site.

As stated in previous 104(e) responses for the Site, ExxonMobil has not operated at the 10628 Fulton Wells Avenue and 10629 Norwalk Blvd, Santa Fe Springs, CA property (the "Property") for more than 50 years. In preparing the 104(e) responses, ExxonMobil has conducted an exhaustive record review of files in our possession. During those reviews, no documentation was identified indicating that ExxonMobil used or stored any hazardous chemicals, substances, or products at the Property.

However, without waiving that position, should the EPA demonstrate or establish a relationship between ExxonMobil and impacts to the groundwater, ExxonMobil is willing to review any additional information available regarding alleged commingling of contaminants and participate in discussions with the EPA in regard to performing the OU2 RD/RA.

CURRENT SITE ACTIVITIES

In the December 18, 2013 Notice Letter, EPA requested that ExxonMobil provide the status of all cleanup or other activities at the Property. Current investigation activities at the Property are guided by an order from the California Regional Water Quality Control Board – Los Angeles Region (“CRWQCB-LAR”) dated August 24, 2010 (copy attached). ExxonMobil’s environmental contractor, Cardno ERI, provides quarterly reports to EPA, most recently in November 2013, in response to EPA’s February 5, 2013 letter requesting such updates.

As requested by the CRWQCB-LAR letter dated May 28, 2013, ExxonMobil submitted three reports on September 30, 2013, a Work Plan for Indoor Air Assessment, a Work Plan for Additional Site Assessment, and a Public Participation Plan. Subsequent to submission, Cardno ERI has engaged with the CRWQCB-LAR multiple times regarding the status of review and approval of the work plans, and provided additional information requested by the CRWQCB-LAR to designate all the proposed drilling locations. ExxonMobil has not yet received a written response from the CRWQCB-LAR regarding the three reports and proposed activities.

Additionally, the 2nd half 2013 groundwater monitoring event was performed on October 9 and 10, 2013, which consisted of monitoring and sampling all of the site’s monitoring wells, and was coordinated with sampling of the wells at the adjacent Continental Heat Treating facility. The results of the monitoring event, including the analytical and water level gauging data, will be reported to the CRWQCB-LAR and EPA in Cardno ERI’s 2nd half 2013 Groundwater Monitoring and Status Report, which will be submitted by February 15, 2014.

Further correspondence or questions regarding activities at the Property should be directed to ExxonMobil’s Primary Contact (see enclosed requested Designation Form).

Respectfully,



Ramon L. Echevarria II

Attachments: LARWQB order letter to EM
Primary Contact Designation Form

cc: Stephen Berninger, Assistant Regional Counsel
U.S. Environmental Protection Agency
75 Hawthorne Street, ORC-3
San Francisco, CA 94105

Keith Olinger, Case Developer
U.S. Environmental Protection Agency
75 Hawthorne Street, SFD-7-5
San Francisco, CA 94105



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

May 28, 2013

Mr. Aaron Thom
ExxonMobil Environmental Services Co.
14950 Heathrow Forrest Parkway
GSC-MI-P022B-2
Houston, Texas 77032

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7012 1640 0000 6294 5281

SUBJECT: REQUIREMENTS FOR SUBMITTAL OF TECHNICAL REPORTS, PURSUANT TO CALIFORNIA WATER CODE SECTION 13267 ORDER

SITE: FORMER JALK FEE PROPERTY, 10607 NORWALK BOULEVARD, SANTA FE SPRINGS, CA (SCP NO. 0203, SITE ID NO. 1848000)

Dear Mr. Thom:

California Regional Water Quality Control Board, Los Angeles Region (Regional Board) staff reviewed the January 10, 2013 *Site Assessment Report* (Report) submitted by Cardno ERI on your behalf, for the referenced site. The Report was required by the Regional Board, pursuant to California Water Code (CWC) section 13267 Order dated August 24, 2010, and amended on May 11, 2012.

The Report presents the results of additional investigations conducted at the site and the adjacent property to the south (Continental Heat Treating). Ten soil borings were drilled, and seven soil vapor wells and two multi-depth groundwater wells were installed at the site. Four soil borings were drilled at Continental Heat Treating. Based upon review of the information submitted in the Report, the Regional Board has the following comments and requirements:

1. Soil vapor samples were collected at depths ranging from approximately 5 feet below ground surface (bgs) to 82 feet bgs, and analyzed for volatile organic compounds (VOCs) and total petroleum hydrocarbons (TPH). Tetrachloroethene (PCE) and Trichloroethene (TCE) were detected at concentrations up to 7,700,000 micrograms per cubic meters ($\mu\text{g}/\text{m}^3$), and 250,000 $\mu\text{g}/\text{m}^3$, respectively, in soil vapor samples collected at approximately 5 feet bgs, in the perimeter of the investigated area. These results indicate that the extent of VOCs in soil vapor is not fully delineated.
2. PCE and TCE concentrations detected in soil vapor samples collected at 5 feet bgs are above their respective California Human Health Screening Levels (CHHSLs) for residential and commercial/industrial land use scenarios. We concur with your conclusion that an evaluation of vapor intrusion into indoor air is needed. To perform this evaluation, indoor air sampling data, or existing soil vapor and shallow soil physical data may be used. If you decide to use soil vapor data, the vapor intrusion evaluation report shall be submitted by **August 30, 2013**. You shall provide all input data and calculations if modeling is conducted for the site-specific evaluation or screening purpose in this report.

MARIA MEHRANIAN, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

320 West 4th St., Suite 200, Los Angeles, CA 90013 | www.waterboards.ca.gov/losangeles

May 28, 2013

However, if you decide to conduct indoor air sampling to complete the required vapor intrusion evaluation, you are required to submit a workplan for indoor air sampling for our review and approval.

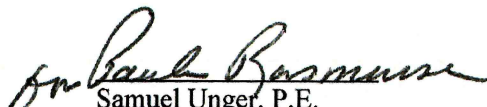
The site-specific vapor intrusion evaluation shall be conducted in accordance to the October 2011, *Final Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air*, developed by the California Department of Toxic Substances Control, or its latest version.

3. Soil samples were collected at depths ranging from approximately 10 to 212 feet bgs, and analyzed for VOCs and TPH. PCE was detected at concentrations of 1,440 micrograms per kilogram at 35 feet bgs, in the perimeter of the investigated area. This result indicates that the extent of VOCs in soil is not fully delineated.
4. Therefore, you are required to submit a workplan for additional soil vapor and soil investigations by **August 1, 2013**, for our review and approval. The scope of work to conduct indoor air sampling may be included in this workplan, if applicable.
5. Current groundwater analytical data will be evaluated along with data to be obtained from upcoming off-site investigations. Based on this evaluation, additional groundwater investigations to further delineate the VOCs plume originating from the site may be required.
6. To adequately address the public concerns and provide information to the public on progress and status of the site investigations and/or remediation, a Public Participation Plan for the site and surrounding properties shall be prepared and submitted to the Regional Board by **August 30, 2013**, for our review and approval.

The above requirements for submittal of technical reports constitute an amendment to the requirements of the California Water Code section 13267 Order originally dated August 24, 2010. All other aspects of the Order originally dated August 24, 2010, and amendments thereto, remain in full force and effect. The required technical reports are necessary to investigate the characteristics of and extent of the discharges of waste at the site and to evaluate cleanup alternatives. Therefore, the burden, including costs, of the reports bears a reasonable relationship to the need for the reports and benefits to be obtained. Pursuant to section 13268 of the California Water Code, failure to submit the required technical reports by the specified due date may result in civil liability administratively imposed by the Regional Board in an amount up to one thousand dollars (\$1000) for each day each technical report is not received.

If you have any questions, please contact Mr. Luis Changkuon at (213) 576-6667 or lchangkuon@waterboards.ca.gov.

Sincerely,


Samuel Unger, P.E.
Executive Officer

cc: See Next Page

Mr. Aaron Thom
ExxonMobil Environmental Services Co.
SCP No. 0203

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May 28, 2013

Cc: Mr. James Anderson, Cardno ERI
Mr. John Maple
Ms. Michelle F. Smith
Mr. Thomas Clark, Coast Aluminum and Architectural Inc.
Mr. William Macnider, CSI Electric Contractors
Mr. James Stull, Continental Heat Treating
Mr. Michael Francis, Demetriou, Del Guercio, Springer & Francis, LLP
Mr. Douglas O'Donnell, The O'Donnell Group, Inc.
Mr. Terry Hathaway, Norwalk Blvd Yard, LLC
Mr. Jeremy Jungreis, Rutan & Tucker, LLP
Mr. Rick Fero, Fero Environmental Engineering, Inc.

PRIMARY CONTACT DESIGNATION FORM

ExxonMobil Oil Corporation

PLEASE COMPLETE AND RETURN THIS FORM WITHIN THIRTY CALENDAR DAYS OF RECEIPT

Please complete this form by printing or typing the requested information. If any of the information provided on this form changes after submission of the form including, but not limited to, changes in corporate relationships, please notify EPA at the address listed below as soon as possible. Thank you for your cooperation.

1. Please provide the following information for the single person who will be the above-named company's or individual's contact for all future communications (including correspondence, informational mailings, etc.) from EPA regarding Omega. You may designate a legal or other representative as the single primary contact. Please enter "N/A" if the requested information is not applicable to you.

Company/Organization/Individual Name: (only if different from above):	
Name of Designated Contact :	STEVEN ANASTOS Contact's Title: PROJECT MANAGER
Contact's Firm Name:	EXXONMOBIL ENVIRONMENTAL SERVICES CO (EMES)
Street Address (no P.O. Box):	3225 GALLOWAY ROAD, ROOM 8B0824
City, State & Zip:	FAIRFAX VA 22037
Telephone Number:	703.846.3393 Fax Number:
E-mail Address:	STEVEN.P.ANASTOS@EXXONMOBIL.COM
Web-site Address:	
2. Other information:	
Law/Consulting Firm Name (if applicable):	N/A

3. Printed Name and Signature of Person Completing This Form

STEVEN ANASTOS	PROJECT MANAGER	EMES
Printed Name	Title	Company/Organization
SP Anast		23 JAN 14
Signature		Date

4. Please return this form to:

Keith Olinger, Case Developer
U.S. Environmental Protection Agency
75 Hawthorne Street, SFD-7-5
San Francisco, CA 94105